

EPEAT Program

Continuous Monitoring Outcomes Report



Imaging Equipment
IE-2020-01
January 11, 2022

1.0 Background

EPEAT® is a comprehensive voluntary sustainability Type 1 ecolabel that helps purchasers identify sustainable technology products and services. Central to EPEAT are conformity assurance activities that meet the technical rigor and credibility needs of the institutional purchasers who rely upon EPEAT. The EPEAT Program ensures the ongoing conformance of EPEAT-registered products through an ongoing surveillance process known as Continuous Monitoring. Continuous Monitoring activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis.

Some Continuous Monitoring activities require that Investigations be conducted in discrete timeframes called Rounds. The EPEAT Program develops an individual plan for each Continuous Monitoring Round, which specifies the EPEAT Criteria to be investigated, the method of investigation that GEC-approved Conformity Assurance Bodies (CABs) must use and the specific dates when the Investigation activities must be completed. The EPEAT Program also selects the Participating Manufacturers and EPEAT-registered products and assigns Investigations to CABs, which must fully participate in and are responsible for implementing Continuous Monitoring Round activities with their Participating Manufacturer clients. Participating Manufacturers are required to cooperate fully with their GEC-approved CAB during Round activities.

To maintain the level of transparency relied on by purchasers, the EPEAT Program publishes an Outcomes Report at the conclusion of each Round to summarize the activities conducted and to identify the products and Participating Manufacturers that received major nonconformances and the actions taken to restore accuracy of the EPEAT Registry.

This document summarizes the activities and results of Continuous Monitoring Round IE-2020-01 conducted for the Imaging Equipment category.

2.0 Overview of Continuous Monitoring Round IE-2020-01

2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round IE-2020-01 used Level 2 Investigations (laboratory evaluation of products to determine the products' conformance with specific EPEAT Criteria). GEC-approved CABs obtained the products, as identified by the EPEAT Program, from the open market without involvement of the Participating Manufacturers, where possible, and sent them for laboratory evaluation. The laboratories evaluated the products against the specified Criteria and produced reports summarizing the activities conducted and the results. GEC-approved CABs reviewed the reports, made recommendations on conformity, and sent the reports to the EPEAT Program. The EPEAT Program made the final decisions on conformity for the Investigations.

2.2 Criteria Investigated

Continuous Monitoring Round IE-2020-01 focused on Criteria related to the sustainable use of resources. Products are randomly selected (using a random number generator) from a list of Participating Manufacturers. Each product was investigated for the Criteria identified in the table below, however if a product had not selected a Criterion, that Criterion was not investigated.

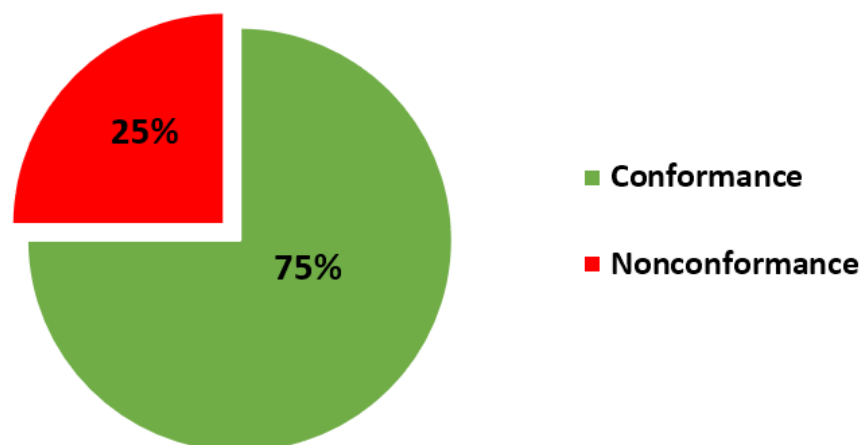
Table 1: Criteria Investigated in Round IE-2020-01	
Criteria Number	Criterion Title
4.3.1.1	Ease of disassembly of product
4.3.1.2	Ease of disassembly of consumer products
4.3.2.2	Restriction on materials not compatible with reuse and recycling
4.3.2.3	Manual separation and marking of plastics
4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs
4.8.2.1	Separable packaging materials
4.8.2.2	Packaging 90% compostable / recyclable
4.8.2.3	Plastics marked in packaging materials

3.0 Summary of Investigations and Final Decisions on Conformity for IE-2020-01

Highlights from this Continuous Monitoring Round are:

- **20** investigations completed
- **15** decisions of Conformance
- **5** decisions of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for IE-2020-01
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for IE-2020-01

Table 2 below provides a breakdown of the nonconformances by Criterion.

Table 2: Breakdown of Nonconformances by Criterion for IE-2020-01				
Criteria Number	Criterion Title	Completed Investigations	Nonconformances	Nonconformance Rate
4.3.1.1	Ease of disassembly of a product	3	1	33%
4.3.2.3	Manual separation and marking of plastics	3	2	67%
4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	3	2	67%

All nonconformances in this Round were major, demonstrated nonconformances, meaning evidence submitted definitively showed that the Criterion was not met.

4.1 Major Versus Minor Nonconformances

All nonconformances must be categorized as either major or minor. For Level 2 Investigations, nonconformances may be categorized as minor only if a GEC-approved CAB is unable to obtain a product from the market and the Participating Manufacturer indicates the product has reached end-of-life and is no longer available on the market. All nonconformances that do not meet the definition of minor are categorized as major.

All nonconformances in Continuous Monitoring Round IE-2020-01 were major nonconformances, and all were categorized as demonstrated nonconformances because the evidence submitted definitively showed that the Criterion was not met.

4.2 Major Nonconformances

In this Round, major nonconformances pertaining to the following three Criteria were identified:

Criterion 4.3.1.1 Ease of disassembly of a product requires the laboratory to disassemble and evaluate the product to ensure it provides ease of access to materials with special handling needs. This includes ensuring external enclosures, chassis, and electronic subassemblies are removable by hand or with commonly available tools; that the product utilizes commonly used fasteners; and that non-separable connections are avoided. The Criterion also requires all disassembly for recycling purposes to be able to be done exclusively with commonly available tools or by hand with sufficient access to points of connection and clearance and for electrical and communication wiring and cables and whole external power supplies to be removable by hand or with commonly available tools. The Criterion does allow for exemptions for some of the requirements due to safety, legal, technical and/or anti-theft reasons. All of these items must be met to demonstrate conformance.

Criterion 4.3.2.3 Manual separation and marking of plastics requires plastic parts >100 g to be manually separable into recyclable plastic streams with commonly available tools and for those parts to be marked with a material code in accordance with ISO 11469. The marking codes must meet all requirements of ISO 11469 or the product is nonconformant.

4.3.3.1 Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs requires manufacturers to make information identifying the presence and location of all materials and components exhibiting hazardous characteristics or requiring special handling (defined as those identified in the EU WEEE Directive) available to reuse and recycling facilities, and to ensure these materials are safely and easily identifiable. In Level 2 Rounds which involve laboratory testing, the documentation provided to reuse and recycling facilities is reviewed. All applicable materials in the product must be identified in the documentation and be easily identifiable.

5.0 Actions to Restore Conformance

Where the final conformity decision is nonconformance (whether major or minor), Participating Manufacturers must make corrections to restore the accuracy of the EPEAT Registry during the Corrective Action Phase. These activities may include providing additional evidence to demonstrate conformance with the criterion or unselecting the criteria in the EPEAT Registry. Where the product was found nonconformant and is no longer available in the marketplace, the product must be archived.

During the Corrective Action Phase, Participating Manufacturers must also develop Corrective Action Plans for other EPEAT-registered products that may be affected by the same underlying issue causing the nonconformance but were not the subject of investigation (called “similarly affected products”).

The following actions were taken to restore accuracy to the EPEAT Registry as a result of Continuous Monitoring Round IE-2020-01:

- **2 investigations** Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- **3 investigations** Product archived by Participating Manufacturer

Table 3 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round IE-2020-01.

6.0 Key Findings

6.1 Conformity Against All Elements of 4.3.1.1

Participating Manufacturers must ensure that all Criterion elements are met, including ease of access to identified components and use of common fasteners, and avoidance of non-separable connections unless required for safety, legal, technical and/or anti-theft reasons.

6.2 Review Plastic Material Codes on Plastics > 100g

Participating Manufacturers are reminded to check applicable plastic parts to ensure they are marked according to ISO 11469.

6.3 Ensure Presence and Location of all Materials and Components Exhibiting Hazardous Characteristics or Requiring Special Handling is Easily Identifiable

Participating Manufacturers are reminded to review all materials and components listed in Annex VII of the European WEEE Directive 2012/19/EU and ensure documentation provided to reuse and recycling facilities identifies all materials and components present in the product.

7.0 Identification of Major Nonconformances and Corrections Made by Participating Manufacturers

In the interest of transparency, the EPEAT Program identifies the Participating Manufacturers and products that received major nonconformances and the actions taken to restore accuracy of the EPEAT Registry. Minor nonconformances are generally clerical in nature and do not materially affect the validity of products in the EPEAT Registry. As such, these are not identified in the table below.

Table 3: Summary of Major Nonconformances and Corrections Made by Participating Manufacturers							
Participating Manufacturer	Product	Product Type	Criterion Number	Criterion Title	Required or Optional	Underlying Reason for Nonconformance	Corrective Action Taken
Canon	WG7250Z	Multifunction device	4.3.1.1	Ease of disassembly of product	Required	Demonstrated nonconformance	Manufacturer archived product
Canon	WG7250Z	Multifunction device	4.3.2.3	Manual separation and marking of plastics	Required	Demonstrated nonconformance	Manufacturer archived product
Canon	WG7250Z	Multifunction device	4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	Required	Demonstrated nonconformance	Manufacturer archived product
Ricoh	RICOH IM 430Fb TL	Multifunction device	4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
Xerox	Xerox B210 Printer	Printer	4.3.2.3	Manual separation and marking of plastics	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance

Document Control and Change History						
Issue	Revision	Owner	Approver	Description	Approval Date	Effective Date
1	0	EPEAT Conformity Assurance Manager	Director, EPEAT Program	Initial release		
1	1	EPEAT Conformity Assurance Manager	Director, EPEAT Program		2018 Dec 11	2018 Dec 11
2	0	Senior Manager, Ecolabels and Resources	Senior Director, Ecolabels and Manufacturer Resources	Reformatting of document. Addition of standardized text.	2021 Mar 25	2021 Mar 30